

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER CIVIL NO. 19-2875 (RBK)

**CERTIFICATION OF ADAM M. SLATER
IN OPPOSITION TO DEFENDANTS' MOTIONS IN LIMINE**

ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this certification in opposition to Defendants' motions in limine.
2. Attached hereto as **Exhibit 1** is a true and accurate copy of the transcript of Linda Lin's May 4, 2021 deposition.
3. Attached hereto as **Exhibit 2** is a true and accurate copy of SOLCO00024231, Solco's recall notice.
4. Attached hereto as **Exhibit 3** is a true and accurate copy of SOLCO00024226, Prinston's recall notice.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of the relevant excerpts of IARC, *Some N-Nitroso Compounds* (1978).

6. Attached hereto as **Exhibit 5** is a true and accurate copy of the relevant excerpts of IARC, *Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs Volumes 1 to 42* (1987).

7. Attached hereto as **Exhibit 6** is a true and accurate copy of the EMEA's Guideline on the Limits of Genotoxic Impurities.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of the FDA's Guidance for Industry: Genotoxic and Carcinogenic Impurities in Drug Substances and Products.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of the transcript of Jucai Ge's May 27, 2022 deposition.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of the transcript of Eric Gu's April 6, 2021 deposition.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of the transcript of Min Li's April 20, 2021 deposition.

12. Attached hereto as **Exhibit 11** is a true and accurate copy of the transcript of Jun Du's May 27, 2021 deposition.

13. Attached hereto as **Exhibit 12** is a true and accurate copy of the transcript of Hai Wang's March 10, 2021 deposition.

14. Attached hereto as **Exhibit 13** is a true and accurate copy of PRINSTON0073102, ZHP's DMF amendment for the ZnCl₂ process.

15. Attached hereto as **Exhibit 14** is a true and accurate copy of ZHP01843066, ZHP's Change Request form for the ZnCl₂ process.

16. Attached hereto as **Exhibit 15** is a true and accurate copy of ZHP00469139, ZHP's Change Control SMP.

17. Attached hereto as **Exhibit 16** is a true and accurate copy of HUAHAI-US00007752, the ZnCl₂ DMF.

18. Attached hereto as **Exhibit 17** is a true and accurate copy of PRINSTON00080011, the TEA with sodium nitrite quenching DMF.

19. Attached hereto as **Exhibit 18** is a true and accurate copy of Plaintiffs' translation of ZHP00190573, the July 27, 2017 email.

20. Attached hereto as **Exhibit 19** is a true and accurate copy of ZHP's translation of ZHP00190573, the July 27, 2017 email.

21. Attached hereto as **Exhibit 20** is a true and accurate copy of PRINSTON00162349, the FDA's EIR for the July 23 to August 3, 2018 inspection.

22. Attached hereto as **Exhibit 21** is a true and accurate copy of the transcript of Min Li's April 22, 2021 deposition.

23. Attached hereto as **Exhibit 22** is a true and accurate copy of the transcript of Peng Dong's April 1, 2021 deposition.

24. Attached hereto as **Exhibit 23** is a true and accurate copy of Health Canada's *Impurities found in certain angiotensin II receptor blocker (ARB) products, also known as sartans* (Apr. 29, 2019), <https://www.canada.ca/en/health-canada/services/drugs-health-products/compliance-enforcement/information-health-product/drugs/angiotensin-receptor-blocker.html>.

25. Attached hereto as **Exhibit 24** is a true and accurate copy of ZHP01862672, the EMA/EDQM's Final GMP Inspection Report for its September 10 to 13, 2018 inspection.

26. Attached hereto as **Exhibit 25** is a true and accurate copy of the transcript of Peng Dong's March 29, 2021 deposition.

27. Attached hereto as **Exhibit 26** is a true and accurate copy of the Pharmaceutical Inspection Co-operation Scheme's Members webpage, <https://picscheme.org/en/members>.

28. Attached hereto as **Exhibit 27** is a true and accurate copy of the Pharmaceutical Inspection Co-operation Scheme's minutes for its December 18, 2015 meeting.

29. Attached hereto as **Exhibit 28** is a true and accurate copy of the Pharmaceutical Inspection Co-operation Scheme's itinerary for its 2016 Annual Seminar.

30. Attached hereto as **Exhibit 29** is a true and accurate copy of ZHP00454953, Torrent's February 13, 2019 letter to ZHP, highlighted for redaction.

31. Attached hereto as **Exhibit 30** is a true and accurate copy of TEVA-MDL2875-00324735, Teva's September 13, 2018 letter to ZHP, highlighted for redaction.

32. Attached hereto as **Exhibit 31** is a true and accurate copy of ZHP00310309, June 19, 2018 email chain between ZHP and Novartis.

33. Attached hereto as **Exhibit 32** is a true and accurate copy of ZHP00380568, July 5, 2018 email chain between ZHP and Novartis.

34. Attached hereto as **Exhibit 33** is a true and accurate copy of ZHP01390017, June 7, 2018 email chain between ZHP and Novartis.

35. Attached hereto as **Exhibit 34** is a true and accurate copy of ZHP02214647, June 6, 2018 email chain between ZHP and Novartis.

36. Attached hereto as **Exhibit 35** is a true and accurate copy of ZHP00359796, June 5, 2018 email chain between ZHP and Novartis.

37. Attached hereto as **Exhibit 36** is a true and accurate copy of ZHP00405021, May 22, 2018 email chain between ZHP and Novartis.

38. Attached hereto as **Exhibit 37** is a true and accurate copy of the transcript of Jucai Ge's April 28, 2021 deposition.

39. Attached hereto as **Exhibit 38** is a true and accurate copy of the transcript of Hai Wang's March 11, 2021 deposition.

40. Attached hereto as **Exhibit 39** is a true and accurate copy of ZHP02170975, Liteplo, Meek, and Windle, *N-Nitrosodimethylamine: Concise International Chemical Assessment Document 38* (WHO 2002).

41. Attached hereto as **Exhibit 40** is a true and accurate copy of ZHP01881221, Charles Wang's Nonclinical Safety Assessment of NDMA and Recommended Limit in Drug Product.

42. Attached hereto as **Exhibit 41** is a true and accurate copy of ZHP00004352, ZHP's first DIR on NDMA in Valsartan.

43. Attached hereto as **Exhibit 42** is a true and accurate copy of CHARLESWANG000444, July , 2018 email chain between ZHP and Charles Wang.

44. Attached hereto as **Exhibit 43** is a true and accurate copy of ZHP02170920, June 19, 2018 email from Charles Wang to Min Li.

45. Attached hereto as **Exhibit 44** is a true and accurate copy of PRINSTONO0399001, June 29, 2018 email from Min Li to Charles Wang.

46. Attached hereto as **Exhibit 45** is a true and accurate copy of the transcript of Jun Du's May 28, 2021 deposition.

47. Attached hereto as **Exhibit 46** is a true and accurate copy of ZHP00675949, November 2, 2018 internal ZHP email chain.

48. Attached hereto as **Exhibit 47** is a true and accurate copy of the metadata for ZHP00190573, the July 27, 2017 email.

49. Attached hereto as **Exhibit 48** is a true and accurate copy of the transcript of Eric Gu's April 5, 2021 deposition.

50. Attached hereto as **Exhibit 49** is a true and accurate copy of ZHP00190573, the July 27, 2017 email.

51. Attached hereto as **Exhibit 50** is a true and accurate copy of ZHP01881288, an internal ZHP email chain regarding the payment of Charles Wang, with a certified translation of the Chinese email.

52. Attached hereto as **Exhibit 51** is a true and accurate copy of the abstract of ZHP's patent for its optimized valsartan process.

MAZIE SLATER KATZ & FREEMAN, LLC

Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 26, 2024